

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

Case No.: 1:22-cv-1032 (PKC)(JRC)

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

**DECLARATION OF
JONATHON D. WARNER, ESQ.**

Defendants.
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JONATHON D. WARNER, hereby declares and verifies the truth of the following,
under penalty of perjury under the laws of the United States of America, pursuant to Title 28, United
States Code, Section 1746:

1. I am a member of the firm of Warner & Scheuerman (“W&S”), attorneys for
defendants Safa Abdulrahim Gelardi, Vito Gelardi and IME Companions LLC (collectively,
“Defendants”), and I am fully familiar with the facts set forth herein. I submit this declaration to
introduce into evidence certain documents referenced in Defendants’ Memorandum of Law in
Opposition.

2. Defendant’s real estate attorney’s “brief history and timeline” of the
underlying real estate transaction together with all attachments is annexed as Exhibit “A.”

3. Emails between my office and real estate counsel are annexed as Exhibit “B.”

4. Pages 274-282 of the transcript of proceedings from July 29, 2024, are
annexed as Exhibit “C.”

5. Defendants' mortgage statement from Mr. Cooper is annexed as Exhibit "D."

6. Defendants' response to Plaintiff's "safe harbor notice" with attachments is annexed as Exhibit "E."

7. The rental agreement is annexed as Exhibit "F."

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 21, 2024.

/s/ Jonathon D. Warner

Jonathon D. Warner